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Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

AMMON EDWARD BUNDY
Debtor.

Bankruptcy No. 24-23530

Chapter 7

Honorable William T. Thurman

**ST. LUKE'S CREDITORS' MOTION PURSUANT TO FED. R. BANKR. PRO. 2004
FOR AN ORDER AUTHORIZING AN EXAMINATION OF, AND PRODUCTION OF
DOCUMENTS BY, THOMAS KENTON SUNDLOFF, WITHOUT PRIOR NOTICE
OR HEARING PURSUANT TO LOCAL RULE 2004-1**

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth,
Natasha Erickson, M.D., and Tracy Jungman, NP (together "St. Luke's Creditors"), submit this
motion for relief against non-debtor Thomas Kenton Sundloff ("Mr. Sundloff") under
Bankruptcy Rule 2004 and Local Rule 2004-1 as follows.

1. The St. Luke's Creditors are judgment creditors of debtor Ammon Bundy ("Debtor"). The Debtor committed intentional torts against St. Luke's Creditors, and they obtained a judgment in Idaho in excess of \$50 million against Debtor. As of July 17, 2024, (the "Petition Date") the Debtor's judgment liability remained in excess of \$50 million.

2. On August 14, 2024, the Chapter 7 Trustee appointed in this case conducted a meeting of creditors under 11 U.S.C. § 341 (the "341 Meeting") during which the Debtor gave incomplete or deficient responses about his assets and pre-petition transfers of the same.

3. Subsequently, St. Luke's Creditors obtained information from the Debtor during his Rule 2004 Examination, including that he likely has or had interests in business entities and assets in bank account(s) that have not been disclosed or were transferred pre-petition, including to or from Mr. Sundloff.

4. Debtor testified that he started a business in his father-in-law's name. Debtor's father-in-law is Mr. Sundloff. Debtor further testified that when Debtor's customers wanted to pay him by check, his father-in-law incorporated a business and provided Debtor a way to accept the money to avoid collection by St. Luke's Creditors.

5. The St. Luke's Creditors wish to conduct an examination of Mr. Sundloff to discover whether Debtor used Mr. Sundloff, to save, conceal and transfer funds that belonged to him and his bankruptcy estate.

6. Under Local Rule 2004-1, the Court can order such discovery without notice or hearing.

7. The St. Luke's Creditors move this Court to enter an Order authorizing the St. Luke's Creditors to conduct an examination of Mr. Sundloff and compel production of documents from Mr. Sundloff.

8. The St. Luke's Creditors will give Mr. Sundloff no fewer than 14 days' prior written notice of the examination in accordance with Local Rule 2004-1(3)(A).

9. Moreover the St. Luke's Creditors will compel Mr. Sundloff's attendance by a subpoena in accordance with Bankruptcy Rule 2004(c), Bankruptcy Rule 9106, and Local Rule 2004-1(3)(A).

WHEREFORE, the St. Luke's Creditors seek relief under Bankruptcy Rule 2004 as set forth above without further notice or hearing. A proposed order has been lodged herewith.

DATED this 14th day of March, 2025.

HOLLAND & HART LLP

/s/ Erik F. Stidham

Erik F. Stidham

/s/ Engels J. Tejeda

Engels Tejeda

*Attorneys for St. Luke's Health System, Ltd.,
St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha Erickson, M.D., and
Tracy Jungman, NP*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of March, 2025, I caused the foregoing to be filed electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Mark C. Rose
McKay, Burton & Thurman, P.C.
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U.S. Trustee
USTPRegion19.SK.ECF@usdoj.gov

AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF Registered Participants by U.S. First Class Mail and/or e-mail as indicated:

By U.S. First Class Mail – postage prepaid:

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/s/ Erik F. Stidham

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